

**Remarks**

In the Office Action, claims 14 to 16 and 18 to 21 were allowed, claims 3 and 13 were objected to, and claims 1 and 4 to 10 were rejected. Claims 1, 3 to 10, 13 to 16 and 18 to 21 remain pending. Reexamination and reconsideration in view of the following remarks are respectfully requested.

**Procedural Objections**

The Examiner objected to the Specification under 37 CFR §1.75(d)(1), as failing to provide proper antecedent basis for claims 1, 11 and 14 for the limitation "...so that flow of water in the third passage from the water inlet port creates a venturi effect within the second flow passage urging water within the second passage to flow to the drain outlet port." Applicants assume that the Examiner intended to reference claim 10, as claim 11 has been cancelled, and claim 10 includes the objected-to language.

Applicants direct the Examiner's attention to the Summary, page 10, lines 4 to 7, and page 12, lines 4 to 23. In these two locations within the Specification, Applicants have described the relationship of the flow passages and how flow within the third flow passage (passage 188) creates a venturi effect urging water to flow within the second passage (passage 184) toward the outlet port (port 174). The connection between the inlet port (port 164) and the third flow passage is indicated in FIG. 7.

Applicants submit that the Specification provides adequate antecedent basis to support the objected-to language of claims 1, 11 and 14.

**Substantive Rejections**

The Examiner rejected claims 1 and 4 to 10 under 35 U.S.C. §103(a) as being obvious in view of Angelos, U.S. Patent No. 5,881,763. These rejections are respectfully traversed.

As noted in the prior action and not disputed by the Examiner, Angelos only discloses a right angle arrangement between the passages carrying water through the manifold. There is no teaching or discussion of any other arrangement of passages with respect to each other. There is no teaching or suggestion that arrangement of the passages might be desirable or that such an arrangement might create some useful affect. The Examiner has also stated that shallow is a relative term and may also encompass the right angle of Angelos.

Applicants admit that shallow is a relative term but has an understood meaning as being distinct from a perpendicular or right angle. From Webster's Third New International Dictionary, shallow means "departing from the horizontal by only a few degrees, used of an airplane dive, glide, or climb." In such a definition, there is a clear distinction between shallow and right angles. These can be no equating a vertical dive from a shallow dive. This definition is consistent with the Specification, at page 12, line 16 to 23, where Applicants have stated that the angle between the axes of the third flow passage and the second flow passage are preferably inclined at a shallow angle with respect to each other. The preferable angle is further indicated to be close to eight degrees. This is consistent with the dictionary definition of shallow provided above.

As commonly defined, and as used in the Specification, the term shallow, in describing an angle, refers to an angle which is clearly not perpendicular and is preferably closer to parallel than perpendicular. Such an angle is clearly not disclosed, taught or suggested by Angelos.

Without Angelos teaching or suggesting the shallow angle recited in claims 1, 10 and 14, Applicants submit that claims 1, 10 and 14 are not rendered obvious by the cited prior art and that claims 1, 10 and 14 are in condition for immediate allowance. Reexamination and reconsideration are respectfully requested.

The remaining rejected claims 4 to 9 depend from and further limit claim 1. For at least the same reasons cited above with regard to claim 1, Applicants submit that claims 4 to 9 are also in condition for immediate allowance. Reexamination and reconsideration are respectfully requested.

#### Allowed and Allowable Subject Matter

Applicants acknowledge the Examiner's allowance of claims 14 to 16, and 18 to 21. Applicants also acknowledge the Examiner's indication that claims 3 and 13 included allowable subject matter and would be allowed is rewritten in independent form. However, in view of the discussion above, Applicants elect to not amend claims 3 and 13 at this time, while reserving the right to do so in the future.

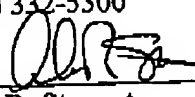
If the Examiner has any questions regarding this Response, the Examiner is invited to contact Applicants' representative Alan Stewart, at 612.371.5376.

Respectfully submitted,

MERCHANT & GOULD P.C.  
P.O. Box 2903  
Minneapolis, Minnesota 55402-0903  
(612) 332-5300

Date:

August 19, 2005

  
Alan R. Stewart  
Reg. No. 47,974

ARS:kf

**23552**

PATENT TRADEMARK OFFICE